

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

No. 04CR-10194-RCL

UNITED STATES OF AMERICA       )  
  )  
VS.    )  
  )  
DAVID JORDAN, et al.,                )  
Defendants                                    )

**DEFENDANT DAVID JORDAN'S MOTION TO AMEND CONDITIONS OF RELEASE**

Now comes the defendant, David Jordan, and moves to amend the conditions of his release regarding the above-captioned matter. Specifically, the defendant requests the Court permit him to obtain employment which is currently available to him and to assist his wife in the daily and/or weekly transportation schedules of the defendant's three children. As reasons therefor, the defendant states the following:


1. On June 10, 2004, pursuant to the Court's Order On Release, the defendant was released from custody pending trial on the above-captioned matter, subject to several conditions. (See Exhibit 1, Order On Release, dated June 10, 2004).
2. Since that Order, which confined the defendant to his residence and restricted him from moving or leaving that residence without the express prior permission of the Court, the defendant has scrupulously observed each of the conditions of his release.
3. Due to the defendant's arrest and confinement to his residence, the defendant has been unable to work or gain employment. As a result, the defendant and his family are experiencing substantial financial hardship. (See Exhibit 2, Correspondence from defendant's wife, Kristen Jordan).
4. Since the defendant's confinement to his residence, the defendant's wife, Kristen Jordan, has become the family's sole source of income. Mrs. Jordan is currently working two jobs while also managing the daily transportation schedule for all three of the Jordans' children. (See Exhibit 2; See Exhibit 3, Schedules and calendars of events for the Jordan children).

5. Recently, the defendant has been offered two employment opportunities. (See Exhibit 4).
6. If the defendant were permitted by the Court to accept one of the afore-mentioned employment opportunities, the defendant would be able to provide much-needed supplemental income and financial support for his family.
7. If the defendant were permitted by the Court to accept one of the afore-mentioned employment opportunities available to him, the defendant would accept any and all additional conditions of release deemed necessary and appropriate.

FOR THE REASONS STATED HEREIN, the defendant, David Jordan, respectfully requests that his conditions of his release be modified to allow him to gain the employment opportunities which are available to him and to assist his wife in the daily and/or weekly transportation schedules of the defendant's three children. The defendant is willing to accept any and all additional conditions of release that would allow him to provide the necessary financial support for his family and as deemed necessary and appropriate.

Respectfully submitted,

DAVID JORDAN, Defendant  
By his attorney,

  
Thomas Drechsler, Esq.  
B.B.O. #134840  
Finneran, Byrne & Drechsler, L.L.P.  
Eastern Harbor Office Park  
50 Redfield Street  
Boston, MA 02122  
Tel. 617-265-3900

DATE: November 29, 2004

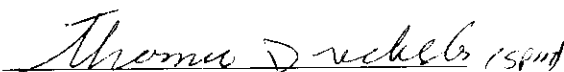
**CERTIFICATE OF SERVICE**

I, Thomas Drechsler, Esq. attorney for the defendant, David Jordan, hereby certify that I served **DEFENDANT DAVID JORDAN'S MOTION TO AMEND CONDITIONS OF RELEASE**, by postage prepaid, first class mail, upon the following counsel of record on November 29, 2004:

Christopher Wylie  
U.S. Pretrial Services  
U.S. Courthouse, Suite 1-300  
One Courthouse Way  
Boston, MA 02210

John T. McNeil, Esq.  
Assistant U.S. Attorney  
Office of the U.S. Attorney  
One Courthouse Way - Suite 9200  
Boston, MA 02210

Michael F. Natola, Esq.  
McBride & Natola  
240 Commercial Street  
Boston, MA 02109

  
Thomas Drechsler, Esq.